

EXHIBIT 9

From: [Maier, Jonathan E.](#)
To: [Evan M. Janush](#)
Cc: ["Anthony Irpino"](#); ["Fuller, Mike"](#); [Tom Egler](#)
Subject: RE: SOM Report Referenced at Teva IQVIA 00004558
Date: Thursday, August 20, 2020 8:59:10 AM

Evan,

This will be produced today. There appears to be some technical problem with the file that IQVIA was able to locate that our vendor has been trying to rectify it so that all metadata is preserved. They cannot resolve the issue, so we will need to produce the report as a PDF without the original metadata.

Thanks,

Jon

Jonathan E. Maier
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Avenue, NW | Washington, DC 20004-2541
Direct: +1.202.739.5806 | Main: +1.202.739.3000 | Fax: +1.202.739.3001
jonathan.maier@morganlewis.com | www.morganlewis.com
Assistant: Christina Lago | +1.202.739.5301 | christina.lago@morganlewis.com

From: Evan M. Janush <Evan.Janush@LanierLawFirm.com>
Sent: Wednesday, August 19, 2020 4:02 PM
To: Maier, Jonathan E. <jonathan.maier@morganlewis.com>
Cc: 'Anthony Irpino' <airpino@irpinolaw.com>; 'Fuller, Mike' <mike@mchughfuller.com>; 'Tom Egler' <TomE@rgrdlaw.com>
Subject: RE: SOM Report Referenced at Teva IQVIA 00004558

[EXTERNAL EMAIL]

Hi Jon,

Can you please let me know whether this one document was conveyed to Plaintiffs/Ricoh for uploading to the "TevaIQVIA" production, and, if not, when we can expect this SOM audit to be produced?

Thank you,

Evan

From: Evan M. Janush
Sent: Friday, August 14, 2020 4:17 PM
To: 'Maier, Jonathan E.'
Cc: Anthony Irpino; Fuller, Mike; Tom Egler
Subject: RE: SOM Report Referenced at Teva IQVIA 00004558

Thank you, Jon. Have a nice weekend.

Best,
Evan

From: Maier, Jonathan E. [<mailto:jonathan.maier@morganlewis.com>]
Sent: Friday, August 14, 2020 4:15 PM
To: Evan M. Janush
Cc: Anthony Irpino; Fuller, Mike; Tom Egler
Subject: RE: SOM Report Referenced at Teva IQVIA 00004558

Evan,

We will produce this report and post it to the same location on Ricoh as the rest of the IQVIA productions.

Thanks,

Jon

Jonathan E. Maier
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Avenue, NW | Washington, DC 20004-2541
Direct: +1.202.739.5806 | Main: +1.202.739.3000 | Fax: +1.202.739.3001
jonathan.maier@morganlewis.com | www.morganlewis.com
Assistant: Christina Lago | +1.202.739.5301 | christina.lago@morganlewis.com

From: Evan M. Janush <Evan.Janush@LanierLawFirm.com>
Sent: Wednesday, August 12, 2020 11:01 PM
To: Maier, Jonathan E. <jonathan.maier@morganlewis.com>
Cc: Anthony Irpino <airpino@irpinolaw.com>; Fuller, Mike <mike@mchughfuller.com>; Tom Egler <TomE@rgrdlaw.com>
Subject: RE: SOM Report Referenced at Teva IQVIA 00004558

[EXTERNAL EMAIL]

Jon,

Thank you for your email. Given that this is a single document, and because at least 6 days have passed since IQVIA produced the document to you, Plaintiffs were hoping to receive Teva's production confirmation by now. However, out of cooperation we will wait another two days, and if we do not receive a final response from you by the end of this week (8/14), Plaintiffs will seek relief from the Court.

That said, Plaintiffs wanted to remind counsel of Teva's prior confirmation made on 2/8/19 in response to DR-15:

"The Teva Defendants have requested from IQVIA any SOM-related reports provided by any of the Buzzeo-related entities and/or IQVIA. To the extent any such reports are provided, the Teva Defendants will produce any non-duplicative, responsive documents to Plaintiffs."

Respectfully,
Evan Janush

From: Maier, Jonathan E. [<mailto:jonathan.maier@morganlewis.com>]
Sent: Wednesday, August 12, 2020 4:17 PM
To: Evan M. Janush
Cc: Anthony Irpino; Fuller, Mike; Tom Egler
Subject: RE: SOM Report Referenced at Teva IQVIA 00004558

Evan,

Apologies for the delay. We are reviewing the document and will get back to you soon.

Thanks,

Jon

Jonathan E. Maier
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Avenue, NW | Washington, DC 20004-2541
Direct: +1.202.739.5806 | Main: +1.202.739.3000 | Fax: +1.202.739.3001
jonathan.maier@morganlewis.com | www.morganlewis.com
Assistant: Christina Lago | +1.202.739.5301 | christina.lago@morganlewis.com

From: Evan M. Janush <Evan.Janush@LanierLawFirm.com>
Sent: Tuesday, August 11, 2020 3:00 PM
To: Maier, Jonathan E. <jonathan.maier@morganlewis.com>
Cc: Anthony Irpino <airpino@irpinolaw.com>; Fuller, Mike <mike@mchughfuller.com>; Tom Egler <TomE@rgrdlaw.com>
Subject: RE: SOM Report Referenced at Teva IQVIA 00004558

[EXTERNAL EMAIL]

Dear Jonathan,

I have not heard from you, and want to provide a final opportunity to respond to me before Plaintiffs address this matter with the Court.

Please let us know by tomorrow whether Teva intends to produce the SOM audit report referenced below (concerning the 9/8/11 SOM audit at Watson) that was originally transmitted to Watson by Cegedim on 9/22/2011, and, if so, please advise the date by which this narrow and specific production will be made to Plaintiffs.

Respectfully,
Evan Janush

From: Evan M. Janush
Sent: Thursday, August 06, 2020 4:25 PM
To: Oot, Patrick L. (SHB)

Cc: Maier, Jonathan E.; Shoshtari, Adam M. (SHB); Anthony Irpino; Fuller, Mike; Tom Egler
Subject: Re: SOM Report Referenced at Teva IQVIA 00004558

Thank you very much, Patrick. We appreciate the manner that you responded to this request.

Jonathan, please let us know by Monday whether your client intends to produce the SOM audit report.

Respectfully,
Evan Janush

Evan M. Janush - Managing Attorney - New York p: 212-421-2800 w: www.LanierLawFirm.com

On Aug 6, 2020, at 4:19 PM, Oot, Patrick L. (SHB) <OOT@shb.com> wrote:

Hi Evan.

We located the document and provided it to counsel to follow the process that we used in the original production.

I copied Jonathan Maier who can help navigate that process.

Best,

Patrick

Patrick Oot
Shook, Hardy & Bacon L.L.P.
1800 K Street NW - Suite 1000
Washington, DC 20006
202.639.5645 | m 703.472.6576
oot@shb.com

MAY CONTAIN CONFIDENTIAL ATTORNEY-CLIENT COMMUNICATION CONTAINING WORK PRODUCT AND/OR ATTORNEY-CLIENT PRIVILEGED COMMUNICATIONS FROM RETAINED OUTSIDE COUNSEL

From: Evan M. Janush <Evan.Janush@LanierLawFirm.com>
Sent: Wednesday, July 29, 2020 1:12 PM
To: Oot, Patrick L. (SHB) <OOT@shb.com>
Cc: Shoshtari, Adam M. (SHB) <ASHOSHTARI@shb.com>; 'Anthony Irpino' <airpino@irpinolaw.com>; Fuller, Mike <mike@mchughfuller.com>; Tom Egler <TomE@rgrdlaw.com>
Subject: SOM Report Referenced at Teva IQVIA 00004558

EXTERNAL

Dear Patrick:

I hope this e-mail finds you to be well. I am writing concerning a narrow and specific production issue arising from IQVIA's document production pursuant to Discovery Ruling No. 15 in MDL 2804 ("DR-15").

Plaintiffs seek a suspicious order monitoring ("SOM") report drafted by Cegedim following a 9/8/2011 Cegedim site visit at Watson Pharmaceuticals. As shown below, this SOM report was transmitted by Cegedim employee Robert Williamson (an agreed IQVIA e-mail custodian) to at least one Watson Pharmaceuticals (now Allergan/Actavis/Teva) employee at 9:07 a.m. on 9/22/2011. However, this SOM report was not included in IQVIA's production and we hereby request a copy of same.

For background and identification, IQVIA produced a 9/22/2011 email chain involving Robert Williamson which shows that he sent the SOM report to Tom Napoli at Watson Pharmaceuticals (now Allergan/Actavis/Teva), copying IQVIA employee Paul Hambly, among others. Attached is a copy (Teva_IQVIA_00004558-9). This email chain included 3 emails. The top email (i.e., most

recent) in the chain was sent by Mr. Williamson at 9:37 a.m. on 9/22/2011. The bottom email in the chain is Mr. Williamson's initial email (from 9:07 a.m.) which states: "[p]lease find attached a follow up report from our visit to Watson on September 8th." See Teva_IQVIA_00004558-9, attached hereto. Unfortunately, the email chain IQVIA produced does not include the SOM report since the report was sent with the bottom email and not the top email.

We are concerned that during a de-duplication process or due to some other production issue, IQVIA's DR-15 production may have inadvertently removed or otherwise failed to capture the initial email in this string, together with the attached SOM report.

Prior to bringing this matter to you, we have searched the remainder of IQVIA's production and have not located this SOM report. Given the fact that Mr. Williamson forwarded the SOM report with his 9/22/2011 (9:07 am) email, we are asking IQVIA to produce same. We believe that our request is both narrow and specific, and we do not believe that this will be a difficult task. However, if there are any questions or if you would like to discuss any of the above, we are happy to meet and confer with you at your convenience.

Respectfully,
Evan Janush

Evan M. Janush
Managing Attorney - New York
p: 212-421-2800
126 East 56th Street, 6th Floor
New York • NY • 10022
www.LanierLawFirm.com

CONFIDENTIALITY NOTICE: This e-mail message including attachments, if any, is intended for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message. Thank you.

DISCLAIMER

This e-mail message is intended only for the personal use of the recipient(s) named above. This message may be an attorney-client communication and as such privileged and confidential and/or it may include attorney work product. If you are not an intended recipient, you may not review, copy or distribute this message. If you have received this communication in error, please notify us immediately by e-mail and delete the original message.